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January 26, 2022

**VIA ECF**

Hon. Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: United States v. Al Malik Alshahhi, et. al., No. 1:21-cr-00371 (BMC)**

Dear Judge Cogan:

On behalf of defendant Matthew Grimes in the above-referenced case, we respectfully write to request access to certain data concerning the Master Jury Wheel from which the Grand Jury was selected in this case. The U.S. Attorney's Office for the Eastern District of New York has agreed to allow counsel for Mr. Grimes to inspect "a limited set of data – namely, the county of residence, zip code, and, to the extent available, the race and age of the individuals listed in the Master Jury Wheel from which the grand jury was selected" – and has consented to this request.

The government informed defense counsel that this type of data is currently held with the Clerk's Office and that any inspection of the material identified above must go through that office. Counsel for Mr. Grimes wishes to make the Court aware of this consented-to request and inquire how Your Honor would like us to proceed with respect to our inspection of the materials outlined above. Please let us know at your earliest convenience how or when the Court, together with the Clerk's Office, would like this inspection to take place.

If you have any questions regarding these requests, please do not hesitate to contact me.

Respectfully,

/s/ Abbe David Lowell

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*Attorney for Defendant Matthew Grimes*

cc: All counsel of record (via ECF)